

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

_____	)	
UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 21-cr-10018-PBS
	)	
GANG CHEN	)	
	)	
	)	
Defendant.	)	
_____	)	

**PROFESSOR GANG CHEN’S UNOPPOSED MOTION TO  
MODIFY PRETRIAL CONDITIONS TO ALLOW TRAVEL  
TO CALIFORNIA**

Professor Gang Chen respectfully requests this Court modify his conditions of pretrial release to allow him to travel to California on December 15 through December 27 to visit family. Professor Chen has alerted U.S. Probation of the travel and will check in with U.S. Probation as prescribed by that office. The Government has informed counsel that they do not object to the travel.

Respectfully submitted,

GANG CHEN

By his attorneys,

/s/ Robert A. Fisher

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Dated: December 12, 2021

**LOCAL RULE 7.1(A)(2) CERTIFICATION**

I hereby certify that I conferred with counsel for the government in an attempt to resolve or narrow the issues raised by this motion and the government has notified me that it does not oppose the motion.

/s/ Robert A. Fisher

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the forgoing was filed electronically on December 12, 2021, and thereby delivered by electronic means to all registered participants as identified on the Notice of Electronic Filing.

/s/ Robert A. Fisher